



November 20, 2020

Via Electronic Filing

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, SC 29210

Re: Duke Energy Carolinas, LLC's Establishment of Solar Choice Metering Tariffs Pursuant to S.C. Code Ann. Section 58-40-20 (**Docket No. 2020-264-E**); Duke Energy Progress, LLC's Establishment of Solar Choice Metering Tariffs Pursuant to S.C. Code Ann. Section 58-40-20 (**Docket No. 2020-265-E**).
Letter in Support of Stipulation

Dear Ms. Boyd:

In response to the Solar Choice Tariff Application filing by Duke Energy Carolinas, LLC ("DEC") and Duke Energy Progress, LLC ("DEP") on November 2, 2020 in the above-referenced dockets, Vote Solar wishes to express our enthusiastic support for the stipulation as a visionary solution that puts South Carolina at the forefront of states addressing the evolution of customer-sited solar policy. While there are elements of the settlement that are specific to South Carolina and to the Companies' unique residential cost of service studies, electrical grid, and generation resource mix, Vote Solar holds up the collaborative process and creative, solution-seeking approach fostered by the Companies as a national model.

Net energy metering is one of the most popular customer energy programs in the country and, under this Commission's watch, South Carolina has become a national example of how well-designed policy can effectively meet and exceed stated goals. By approving a net energy metering settlement and accompanying distributed energy resource ("DER") programs in 2015, this Commission unlocked significant economic activity and fostered a home-grown solar industry that has empowered over 20,000 homes and businesses to install solar and take control over their energy bills. The overwhelming success of this policy over a short amount of time caught lawmakers, utilities, and advocates by surprise, as we reached the statutory caps set on customer-generators several years ahead of the anticipated 2020 sunset date for the Act 236 program. After a bruising legislative session in 2018, legislative leadership demanded that the utilities and solar advocates come together and try to chart a path of consensus. In 2019, Vote Solar participated in the collaborative conversations and negotiations leading the creation and unanimous passage of the Energy Freedom Act ("Act 62").

The Companies' filing represents the culmination of several years of policy discussions and trust-building among the parties to the stipulation and, in Vote Solar's view, embraces the joint goals embedded by the General Assembly in the Energy Freedom Act: (1) a policy process that reflects a commitment to collaboration to achieve win-win, consensus-based solutions; (2) a policy that expands access to solar options to an ever-growing body of South Carolinians that want to go solar; (3) a policy that mitigates any potential negative impact of customer-generators on non-participants; and (4) a policy that enables the solar industry to survive and to continue to create economic opportunity and employment for thousands of South Carolinians. From Vote Solar's perspective, the stipulation—in addition to linked demand-side solutions that will be proposed in coming months—satisfies these core legislative objectives behind Act 62 and the development of a solar choice metering policy.

Vote Solar appreciates the Companies willingness to meaningfully engage in collaboration and to consider innovative options to produce “win-win” scenarios for ratepayers, solar customers, the solar industry, utilities, the environment, and the state economy. The Solar Choice Metering tariff, which is intended to be paired with other demand response and demand-side programs, puts customer-generators in a position of greater control over their electric bills with time-variant rates and critical peak pricing signals. Vote Solar is excited to see South Carolina jump to the lead in the evolution of rooftop solar to harness the power of solar customers as well as the solar facilities themselves. As will be filed in a future docket, customer-generators that choose the option to engage in demand response and paired energy efficiency programs will receive an additional upfront incentive to make the Companies' grid more flexible over time, help reduce carbon emissions, and lower overall system costs to the benefit of all ratepayers. This option could likely be the critical difference between a lagging and thriving rooftop solar industry in South Carolina. This creative approach looks at customer-generators holistically (as consumers and producers of electricity), and takes a true step toward an energy future where customers are given an ever-growing role as partners to the utility in solving challenges. Vote Solar looks forward to making a fuller presentation in support of the stipulation (and the energy efficiency option in a future docket), but appreciates the Commission's attention and care to the foundation of future solar policy in the state in this groundbreaking proceeding.

Sincerely yours,

/s/ Thadeus B. Culley

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cc: All parties of record